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July 5, 2012

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: Reply to the Comments of “Deaf VRS User”: CG Docket No. 10-51

Dear Ms. Dortch:

CSDVRS, LLC (“ZVRS”) is committed to being a highly ethical company and has a number of policies and practices to ensure that it serves VRS users in a fully ethical and compliant manner. ZVRS accordingly desires to address the portion of “Deaf VRS User’s” comment filed with the Commission which alleges that ZVRS is a provider which makes it “easy” for hearing individuals to obtain a ten digit phone number which leads to “fraud[] and waste....”¹

In accordance with Commission rules, ZVRS requires all new registrants to self-certify that they are deaf or hard of hearing prior to receiving a ten digit number, and maintains their certification in ZVRS’ records.² On that same registration webpage, ZVRS states several times that it is “unlawful for hearing people to obtain a ten digit number” and provides that the FCC mandates that “**ONLY** individuals who are deaf or hard of hearing and use American Sign Language (ASL) may obtain a 10-digit phone number.” This prohibition is also publicly communicated by ZVRS in a number of other ways, including its online “Code of Ethics.”

Further, ZVRS trains its Video Interpreters (“VIs”) to detect if hearing people are unlawfully using its VRS and to immediately disconnect such a call. In addition, ZVRS’

¹ *Structure and Practices of the Video Relay Service Program*, Comments of “Deaf VRS User,” CG Docket No. 10-51 (July 2, 2012).

² See <https://www.zvrs.com/my/register>

representatives follow up point to point with all new registrants regarding their new video hardware and software obtained from ZVRS and this serves as another form of detection if hearing persons unlawfully attempted to obtain ZVRS services and products.

ZVRS does not tolerate any form of fraud or waste of TRS Funds in the provision of a critical service and is confident that its rigorous policies and practices establish a highly ethical and compliant VRS program.

Sincerely,

/s/

Jeff Rosen
General Counsel